

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

NICOLE P. ERAMO)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:15-cv-00023-GEC
)	
ROLLING STONE LLC,)	
SABRINA RUBIN ERDELY, and)	
WENNER MEDIA LLC,)	
)	
Defendants.)	
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**JOINT MOTION FOR A NEW TRIAL DATE AND
ENTRY OF THE SECOND AMENDED SCHEDULING ORDER**

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, Plaintiff Nicole P. Eramo and Defendants Rolling Stone LLC, Sabrina Rubin Erdely, and Wenner Media LLC (collectively, the “Parties”), move the Court for a new trial date beginning on October 11, 2016, and for entry of the Second Amended Scheduling Order. In support thereof, the Parties state as follows:

1. This matter is currently set for a two-week trial from July 18, 2016 to July 29, 2016. (Dkt. No. 26).
2. At the Parties’ request, on August 4, 2015 the Court entered an Amended Scheduling Order, which sets forth the current discovery and pre-trial deadlines. (Dkt. Nos. 29-30.)
3. The Parties have diligently engaged in discovery, which has been extensive. In addition, given the claims and defenses at issue, significant third-party discovery has been

necessary, including the discovery of education records under FERPA and document and deposition discovery from third-party sources that have (and will be) the subject of motions practice. Due to its scope, and the complexities presented by third-party discovery in this case, discovery has taken longer than initially anticipated.

4. For these reasons, the Parties respectively request an extension of the current case schedule.

5. Specifically, the Parties request that the Court move the trial of this matter to begin on October 11, 2016, and run for two weeks to until October 24, 2016.

6. The Parties also request that the Court enter the Second Amended Scheduling Order to govern the remaining deadlines in this case, a copy of which is attached as **Exhibit A**.

WHEREFORE, the Parties respectfully request that this Court move the trial to October 11-24, 2016, and enter the proposed Second Amended Scheduling Order.

Dated: February 17, 2016

Respectfully submitted,

/s/ Thomas A. Clare

Thomas A. Clare (VSB No. 39299)
Elizabeth M. Locke (VSB No. 71784)
Andrew C. Phillips (VSB No. 88880)
CLARE LOCKE LLP
902 Prince Street
Alexandria, VA 22314
Telephone: (202) 628-7400
E-mail: tom@clarelocke.com
E-mail: libby@clarelocke.com
E-mail: andy@clarelocke.com

Attorneys for Plaintiff Nicole P. Eramo

/s/ Michael J. Finney

Elizabeth A. McNamara (admitted *pro hac vice*)

Samuel M. Bayard (admitted *pro hac vice*)

DAVIS WRIGHT TREMAINE LLP

1251 Avenue of the Americas, 21st Floor

New York, New York 10020

Telephone: (212) 489-8230

Fax: (212) 489-8340

E-mail: lizmcnamara@dwt.com

E-mail: samuelbayard@dwt.com

Alison B. Schary (admitted *pro hac vice*)

DAVIS WRIGHT TREMAINE LLP

1919 Pennsylvania Avenue NW, Suite 800

Washington, DC 20006-3401

Telephone: (202) 973-4248

Fax: (202) 973-4448

E-mail: alisonschary@dwt.com

W. David Paxton (VSB No. 19798)

Michael J. Finney (VSB No. 78484)

GENTRY LOCKE

10 Franklin Road S.E., Suite 900

P.O. Box 40013

Roanoke, VA 24022-0013

Telephone: (540) 983-9300

Fax: (540) 983-9400

E-mail: paxton@gentrylocke.com

E-mail: finney@gentrylocke.com

Attorneys for Defendants Rolling Stone LLC, Sabrina Rubin Erdely, and Wenner Media LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2016, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which then sent a notification of such filing (NEF) to all counsel of record.

/s/ Michael J. Finney